

JOHN W. HUBER, United States Attorney (#7226)
TRINA A. HIGGINS, Assistant United States Attorney (#7349)
JACOB J. STRAIN, Assistant United States Attorney (#15204)
Attorneys for the United States of America
Office of the United States Attorney
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111-2176
Telephone: (801) 524-5682

FILED
U.S. DISTRICT COURT
2019 OCT 29 P 3:41
DISTRICT OF UTAH
BY: _____
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROSCOE BENJAMIN ATKINSON,

Defendant.

**FELONY
INFORMATION**

Case: 2:19-cr-00408

Assigned To : Shelby, Robert J.

Assign. Date : 10/30/2019

Description: USA v. Atkinson

The United States Attorney alleges:

COUNT 1
18 U.S.C. § 1343
(Wire Fraud)

Beginning on or about May 25, 2018, and continuing through March 1, 2019, in the Central Division of the District of Utah,

ROSCOE BENJAMIN ATKINSON

Defendant, having devised a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, that is, in his capacity as the controller of STG, he wrote STG checks to San Tan Financial LLC, a company he controlled, under the false pretense that San Tan Financial had

engaged in consulting work for STG when he knew those representations were false and material, and he carried out the scheme by causing wire communication to be transmitted in interstate commerce by depositing 44 checks, totaling \$814,799.81, from STG's account at Key Bank into his San Tan Financial Account at Wells Fargo Bank, including depositing STG check #XX210 for \$25,000.00 from STG's account #XXXXXX479 into my San Tan Financial account #XXXXXX774 on July 19, 2018; all in violation of 18 U.S.C. § 1343.

COUNT 2
18 U.S.C. § 1956
(Money Laundering)

On or about June 25, 2018, in the Central Division of the District of Utah,

ROSCOE BENJAMIN ATKINSON

Defendant, conducted a financial transaction affecting interstate commerce with money he knew represented the proceeds of the unlawful activity alleged in Count 1, that is purchasing a 2019 Toyota 4Runner using a cashier's check written from his San Tan Financial Account for \$46,670.99, knowing the transaction was designed in part to conceal and disguise the nature, source, ownership, and control of the proceeds of the unlawful activity alleged in Count 1; all in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense in violation of 18 U.S.C. § 1343, the defendant shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from

proceeds traceable to the scheme to defraud. The property to be forfeited includes, but is not limited to:

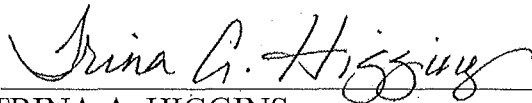
- \$532,379.71 (seized from WFB 8029)
- \$ 42,992.22 (seized from WFB 5774)

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. § 1957, the defendant shall forfeit to the United States of America any property, real or personal, involved in such violations, and any property traceable to such property. The property to be forfeited includes, but is not limited to the following:

- Toyota, 4Runner, JTEBU5JR6K5648466

DATED this 29th day of October, 2019.

JOHN W. HUBER
United States Attorney


TRINA A. HIGGINS
Assistant United States Attorney